

APR 16 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

)  
Amendment of Part 21 of the )  
Commission's Rules for the )  
Domestic Public Fixed Radio )  
Services )

CC Docket No. 93-2 /

To: The Commission

REPLY COMMENTS OF THE  
CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION

The Cellular Telecommunications Industry Association ("CTIA") submits these reply comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), released February 9, 1993, in the above-captioned proceeding.

In the NPRM, the Commission invites comments on its proposal to revise Part 21 of the Rules to permit applicants for new or modified facilities in the Point-to-Point Microwave Radio Service ("PPMS") to begin construction of the proposed facilities prior to grant of an authorization. In addition, the NPRM seeks comments on the proposed revision and elimination of several reporting requirements for all Part 21 applicants, including PPMS applicants.<sup>1</sup>

Cellular carriers make extensive use of point-to-point microwave services to provide service in both Metropolitan and Rural Service Areas. The use of microwave facilities permits

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<sup>1</sup>NPRM, ¶ 1.

cellular carriers to exercise greater control over the operation and maintenance of their cellular systems ensuring greater reliability and redundancy from the public switched network, often at significant savings in the cost of facilities. The use of

applicants to commence operation prior to receipt of authorization.

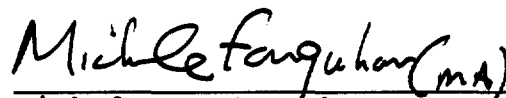
A number of commenting parties have suggested alternatives that would enable licensees to initiate operation of point-to-point microwave facilities on an accelerated basis. CTIA urges the Commission to adopt rules that will permit applicants to initiate permanent point-to-point microwave service with a minimum of delay.

Respectfully submitted,

Cellular Telecommunications  
Industry Association



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Dated: April 16, 1993

**CERTIFICATE OF SERVICE**

I, Kimberley Garnes, hereby certify that on this 16th day of  
April, 1993, copies of the foregoing Reply Comments of Cellulose